## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

IVETTE M. MARTÍNEZ GONZÁLEZ, et als.

**Plaintiffs** 

**CIVIL NO. 16-2077** 

٧.

CATHOLIC SCHOOLS OF THE ARCHDIOCESES OF SAN JUAN PENSION PLAN, et als.

Defendants

CIVIL ACTION UNDER
THE PROVISIONS OF
E.R.I.S.A.; PRELIMINARY
AND PERMANENT
INJUNCTION; TEMPORARY
RESTRAINING ORDER

## MOTION REQUESTING LEAVE AND ACCEPT PLAINTIFFS' MOTION TO COMPEL (DKT. NO. 123) IN EXCESS OF THE 15-PAGE LIMIT

## TO THE HONORABLE COURT:

COME NOW plaintiffs, through their undersigned attorneys and respectfully state and pray:

- 1. On July 31, 2017 plaintiffs filed a Motion to Compel Discovery and Request for Extension of Time to File Response in Opposition to Motion to Dismiss. Dkt. number 123. Said motion is 21 pages long, just 6 pages in excess of the page-length provided by Local Rule 7(d).
- 2. Plaintiffs involuntarily omitted to request leave from this Honorable Court to file its motion in excess of the 15-page limit of said rule.
- 3. Defendants Catholic Schools of the Archdioceses of San Juan Pension Plan and the Superintendence of Catholics Schools of the Archdioceses of San Juan filed a Motion to Strike plaintiffs' Motion to Compel Discovery (Dkt. number 132) based

only in Local Rule 7(d).

4. Due to the nature of the case, the complex legal issues at hand, and the

extent of defendants' objections to plaintiffs' discovery requests, plaintiffs had to exceed

the page limit set forth by Local Rule 7(d).

5. Thus, plaintiffs respectfully move this Honorable Court to grant them leave

to exceed the aforementioned page limit and accept the Motion to Compel filed by them

and, therefore, deny co-defendants' Motion to Strike.

WHEREFORE, it is respectfully requested from This Honorable Court to enter

and order as herein requested.

RESPECTFYULLY SUBMITTED.

WE CERTIFY that on this same date plaintiffs filed the instant motion using the

CM/ECF System which will send notification to all counsel of record.

In San Juan, Puerto Rico, this 21<sup>st</sup> day of August, 2017.

**CARLOS F. LOPEZ LAW OFFICE** 

P.O. Box 8852

San Juan, P.R. 00910-0852

Tel. 787-273-0611

Fax 787-273-1540

E-Mail: charlielopez@gmail.com

cflopez@atriumoc.com

AMUNDARAY, VILLARES & ASSOCIATES, PSC

P.O. Box 9023980

San Juan, PR00902-3980

Tel. (787) 273-0611

Fax (787) 273-1540

E-Mail: fjamundaray@aol.com

fjamundaray@me.com

s/ Carlos F. López

Carlos F. López, Esq.

USDC 126514

S/FRANCISCO J. AMUNDARAY

USDC-PR-208706

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